



State of New Jersey
DEPARTMENT OF COMMUNITY AFFAIRS
OFFICE OF SMART GROWTH
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JON S. CORZINE
Governor

SUSAN BASS LEVIN
Commissioner

EILEEN SWAN
Executive Director

June 19, 2006

The Honorable Carl W. Block
Mayor of Stafford Township
260 East Bay Ave.
Manahawkin, NJ 08050-3329

**Re: Stafford Township Petition for Initial Plan Endorsement
 Completeness Determination**

Dear Mayor Block:

After review of the additional information submitted by Stafford Township for Initial Plan Endorsement, pursuant to the State Planning Rules, N.J.A.C. 5:85-7.5(b), the Office of Smart Growth finds the petition complete as amended. I would like to commend the Township for the significant planning efforts that have been undertaken and thank you for the time and effort you have committed to complying with the State Planning Commission's (SPC) Plan Endorsement process.

The Township or any interested person may request that the Office of Smart Growth conduct a public hearing on the Township's petition. A request for a public hearing must be submitted to the Office of Smart Growth by Thursday, June 29, 2006. The public also has an opportunity to provide comments at any time during the process until the SPC takes final action on the petition.

State, federal and regional agencies have 45 days within which to review the petition and provide comments to the Office of Smart Growth regarding the petition's consistency with the State Plan. This review period ends Thursday, August 3, 2006.

Within 60 days following the end of this review period, by Monday, October 2, 2006, or unless otherwise agreed, the Office of Smart Growth will prepare a report to the SPC assessing the consistency of Stafford Township's petition and draft Planning and Implementation Agreement (PIA) with the goals, policies and strategies of the State Plan. If the Office of Smart Growth has not made a recommendation to the SPC at the end of the agreed upon review period, the Township may directly petition the SPC to take action on the Township's petition.

I would also like to take this opportunity to convey some preliminary concerns that will need to be addressed in order for OSG to make a recommendation of consistency to the SPC. These concerns are listed below and are only cursory, as OSG and the state agencies will now begin the substantive review of the Township's petition. This review period will produce detailed findings and recommendations regarding the consistency of the petition with the State Plan. OSG and our state agency partners remain committed to working with the Township and providing technical assistance to address any concerns and to help the Township achieve Initial Plan Endorsement.



Consistency Concerns

Natural Resource Inventory (NRI)

I am aware that the Township recently received a grant from the Association of New Jersey Environmental Commissions (ANJEC) to complete the Environmental Resource Inventory (ERI) to meet the NRI requirement. The NRI should provide enough detail to allow consideration of local conditions meriting special consideration. The submitted ERI, however, lacks the level of detail necessary to adequately serve as a resource document for future planning and land use. Some sections (e.g. parts of section IV on Hydrologic Factors) of the ERI contain regional-level information but do not sufficiently discuss their relevance at the local level of the Township. Other sections (e.g. historic sites) identify features generally, without detail as to what these features include and why they are significant. The NRI should be revised to include more detailed maps and text descriptions of the features and issues related to the Township's natural resources. According to the State Planning Rules, N.J.A.C. 5:85-7.5(f), we may request this additional information. We will work with the Township and provide a sufficient amount of time to provide the requested information.

To assist municipalities in creating NRIs, OSG has placed three sample examples on our website at <http://www.nj.gov/dca/osg/plan/endorsement.shtml>. The Township should refer to these web resources and work with the Department of Environmental Protection (DEP) to revise the inventory so that it may be used as a tool to help guide development and preservation activities.

Affordable Housing

In December 2005, the Council on Affordable Housing (COAH) produced a Report Requesting Additional Information for the Township's Housing Element & Fair Share Plan. The report lists a number of issues that have an impact on the Plan Endorsement petition, including but not limited to projected growth and the suitability of affordable housing sites.

Master Plan

The Planning & Implementation Agreement (PIA) includes an update of the Master Plan by spring 2006. Please provide the current status of this effort. With the most recent re-examination in 2001, another review is due for 2007. The Master Plan update should be coordinated with the Plan Endorsement process as much as possible so that it is consistent with the State Development and Redevelopment Plan (State Plan).

Stafford Regional Center - Justification for Amendments; Center Criteria

The petition adequately cites reasons, such as open space acquisition and the nature of existing development or zoning, for the reduction of the regional center. However, the petition does not provide detail on if and how the revised center still corresponds with the objectives by which the State Planning Commission (SPC) approved the designation in the first place back in 1997. A memorandum dated June 27, 1997 from the then Office of State Planning (OSP) to the Plan Implementation Committee (PIC) of the SPC states: "While the Center does not yet meet SDRP threshold numbers for population, employment, and density, the petition indicates that these thresholds should be achieved over the next 20 years, as the Regional Center continues to evolve" (p.6). The petition should assess the center against the State Plan criteria to determine how development has progressed since 1997 and whether the revised center is likely to meet the criteria in the future. This analysis should include information on how the revised center will sufficiently accommodate growth.

Mayetta Hamlet - Center Criteria

The proposed hamlet is not fully consistent with the State Plan criteria, as it is much larger than the typical hamlet and less densely populated. While this does not necessarily preclude the designation of a hamlet, the petition must discuss these inconsistencies and explain why the hamlet is consistent overall with the State Plan. As the hamlet includes a significant amount of existing development, the data analysis and justification should differentiate between existing and future development, perhaps with a focus on how the latter will be more consistent with the criteria.

Stafford Business Park Redevelopment

The proposed redevelopment for this area will be significant for the Township and affects various aspects of this petition, including the affordable housing issues mentioned above. Please provide a status update of this project, particularly with regard to concerns over species habitat. OSG will work actively with the Pinelands Commission so that any modifications to the project are reflected in related elements of the petition.

Emergency Planning – NJ State Police approval; coordination with Long Beach Island municipalities

In light of Stafford's coastal location and relative proximity to the Oyster Creek Nuclear Plant, the petition should include a copy of the letter from the NJ State Police approving the Township's emergency operating plan.

In addition, Route 72 is the only point of access for communities on Long Beach Island. Please provide information on any coordinated activity that the Township has had with those municipalities in planning for emergencies.

Transportation and Land Use

The Circulation Element should be revised in light of the fact that the widening of Routes 9 and 72 are not likely alternatives for the near future. The Township's planning should reflect a greater integration of land use and transportation alternatives to reduce auto-dependency.

In this regard, the sixth item under the Land Use/Redevelopment section of the PIA should be changed to: "Selectively accommodate commercial development as appropriate in the Route 9 and Route 72 corridors in a manner consistent with compact, mixed use patterns that enhance transportation mode choice and maximize the efficiency of the existing roadway network by distributing traffic more evenly among state, county and local roadways. Future planning in the Route 9 and 72 corridors principally will center on revitalization, redevelopment and infill development. The vision for these corridors should emerge in concert with the work of the related corridor studies."

Community Design

A PIA item from the 1997 Center Designation process was for the Township to "prepare design guidelines to encourage the preservation of the aesthetic character of Manahawkin." While it is clear that the Township has made significant progress for the Manahawkin area through the Department of Community Affairs' Neighborhood Preservation Program, the petition should provide an update on this PIA item and whether there are opportunities for follow-up activity.

Planning & Implementation Agreement (PIA)

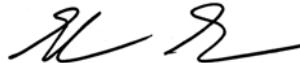
The PIA may need to be updated as state agencies work with the Township on identifying actions that will need to be implemented subsequent to endorsement by the State Planning Commission.

Conclusion

Thank you again for your commitment to the Plan Endorsement process. I would like to emphasize OSG's and the state agencies' commitment to assisting the Township to address any consistency concerns and to achieve Plan Endorsement from the State Planning Commission. I would also like to suggest that the Township schedule a meeting with the Office of Smart Growth and the state agencies in the near future to discuss the items identified within this letter and next steps.

If you have any questions or concerns, please contact myself or Jung Kim, Area Planner for Ocean County, at 609-633-6139 or via email at jkim@dca.state.nj.us.

Sincerely,



Eileen Swan
Executive Director

ES:jk:dds

c: Bernadette M. Park, Municipal Clerk
Paul Shives, Stafford Township Administrator
Dave Roberts, AICP/PP, CLA, Schoor DePalma
Dave Maski, Schoor DePalma
Jamie Sunyak, Schoor DePalma
Joseph I. Donald, PP, Deputy Executive Director, OSG
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